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Richard Malagiere  
Leonard E. Seaman  
Attorneys for Plaintiffs, Marco Palazzi and Pierangela Bonelli

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

MARCO PALAZZI AND  
PIERANGELA BONELLI

Plaintiffs,

v.

CIGNA HEALTH AND LIFE  
INSURANCE COMPANY, JOHN OR  
JANE DOE 1 THROUGH 100,  
FICTITIOUS NAMES BEING  
NATURAL PERSONS AT PRESENT  
UNIDENTIFIED, XYZ  
CORPORATIONS 1 THROUGH 100,  
FICTITIOUS NAMES BEING  
CORPORATIONS AT PRESENT  
UNIDENTIFIED, ABC ENTITIES 1  
THROUGH 100, FICTITIOUS  
NAMES BEING COMMERCIAL  
ENTITIES AT PRESENT  
UNIDENTIFIED.

Defendants.

Civil Action No. 22-cv-6278

**NOTICE OF MOTION TO SEAL**

PLEASE TAKE NOTICE on November 6, 2023, or a date and time to be set by the Court, plaintiffs, Marco Palazzi and Pierangela Bonelli, by and through thier

attorneys The Law Offices of Richard Malagiere, P.C., shall move for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, sealing a portion of plaintiffs' Second Amended Complaint (ECF No. 41). Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(3) have been set forth in the Declaration of Leonard E. Seaman submitted herewith.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Cigna shall rely upon the Declaration Leonard E. Seaman, Esq., and upon the pleadings and all prior proceedings in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that a copy of the proposed Order is submitted with this Notice.

/s/ Leonard E. Seaman  
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LEONARD E. SEAMAN  
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DATED: October 6, 2023